



The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Dear Chairman Genachowski:

I'm writing this letter as a concerned business owner of Network Assurance, a small company located in Missoula, Montana that employs 5 people. My company provides electronic/internet fax services.


We applaud your efforts to protect consumers from phone bill cramming. However, we also strongly believe that third-party billing services provide great value to businesses and consumers alike, and that these services must be preserved in any new rules that are implemented for the industry.

Thousands of businesses across the nation see first-hand the benefits of third-party billing, including the ability to reduce administrative costs and consolidate charges for services onto a single bill. Additionally, millions of consumers each year are able to acquire a broader array of services at more competitive rates, with a billing option that does not require them to open an additional line of credit or manage yet another bill.

As a result of third-party billing services, companies like mine have been able to offer our customers a flexible and hassle-free billing option that saves them time and money, which has helped us remain competitive in an increasingly challenging market. Banning third-party billing would unnecessarily harm businesses like ours, as well as those we serve.

Network Assurance supports your important goal of protecting consumers from cramming. However, we believe that this is best achieved through the implementation of reasonable measures, not through an outright ban of a service that is valued by millions of consumers and is a driver of growth for thousands of businesses. As you consider applying the rules in your Notice for Proposed Rulemaking, we urge you to consider the financial impact they would have across the country.

Sincerely,


Derrick McLaughlin
President